## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

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RHODE ISLAND COALITION AGAINST DOMESTIC VIOLENCE, et al.,

Plaintiffs,

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PAMELA BONDI, et al.,

Defendants.

Civil Action No. 1:25-cv-00279-WES-AEM

## UNOPPOSED MOTION TO EXTEND DEFENDANTS' DEADLINE TO RESPOND TO THE COMPLAINT

Defendants respectfully request that this Court extend their obligation to file a response to the Complaint under Federal Rule of Civil Procedure 12, pending resolution of Plaintiffs' Motion for a Preliminary Injunction, and in support state as follows:

- 1. Plaintiffs filed the instant action of June 16, 2025 and moved for a preliminary injunction on June 26, 2025. ECF Nos. 1, 15.
- 2. Briefing was completed on the preliminary injunction motion on July 25, see ECF No. 25, and a motion hearing was held on July 29, 2025. The Court's resolution of Plaintiffs' preliminary injunction motion is pending.
- 3. Under Federal Rule of Civil Procedure 12(a)(2), the United States and its officers and employees sued in their official capacity must respond to a complaint within 60 days after service on the United States attorney.

- 4. Plaintiffs completed service on the United States Attorney on June 20, 2025, so Defendants' deadline to respond to the Complaint is August 19, 2025.
- 5. On August 4, 2025, Defendants contacted Plaintiffs regarding extending the deadline for Defendants to respond to the Complaint to September 19, 2025.
- 6. On August 5, 2025, Plaintiffs responded that they consented to Defendants' request to extend the deadline to respond to the Complaint to September 19, 2025.
- 7. Defendants submit that good cause exists for such an extension. The Court's resolution of Plaintiffs' Motion for Preliminary Injunction is likely to substantially affect subsequent proceedings in this litigation. Accordingly, extending the time for Defendants to answer or otherwise respond will likely conserve the Parties' and the Court's resources. No previous extensions have been sought or granted. A proposed order is attached.

Dated: August 6, 2025 Respectfully submitted,

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ERIC J. HAMILTON
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/s/ Kathryn Barragan

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